

FILED

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA

OCT 21 2024

PRO SE PRISONER CIVIL RIGHTS COMPLAINT

BONNIE HACKLER  
Clerk, U.S. District Court

Deputy Clerk

Joe Luis VILLASANA

Plaintiff's full name (Please print)

Case No.

(To be filled out by Clerk's  
Office only)

v.

(ETL, AL)

SUZANNE JORDAN

official AND  
individual capacity

Defendant(s) full name (Please print)

TERRY PARKS - official AND individual capacity

BRANDY WALLACE - official AND individual capacity

For additional names please write "see attached" in the space  
above and attach an additional sheet of paper with the full list  
of names. The names listed in the above caption must be  
identical to those contained in Section IV, pursuant to Fed.  
R. Civ. P. 10(a).

NOTICE

Federal Rule of Civil Procedure 5.2 and Local Civil Rule 5.3 address the privacy and security concerns resulting from public access to electronic court files. Under these rules, papers filed with the court should not contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include only: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Each claim you raise must be properly exhausted. If the evidence shows that you did not fully comply with an available prison grievance process prior to filing this lawsuit, the court may dismiss the unexhausted claim(s) or grant judgment against you. See 42 U.S.C. 1997e(a).

Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

**I. JURISDICTION**

*Indicate below the federal legal basis for your claim, if known.*

- ☒ 42 U.S.C. § 1983 (state, county, or municipal defendants)
- ☐ Action under *Bivens v. Six Unknown Federal Narcotics Agents*, 403 U.S. 388 (1971) (federal defendants)

**II. PLAINTIFF INFORMATION**

Joe Luis VILLASANA

Full name

Aliases

2018455

Prisoner ID #

John Lilley Correctional Center

Place of Detention/Incarnation

407971 Hwy 62 E

Institutional Address

Boley

City

Oklahoma

State

74829

Zip Code

**III. PRISONER STATUS**

*Indicate whether you are a prisoner or other confined person as follows:*

- ☐ Pretrial detainee
- ☐ Civilly committed detainee
- ☐ Immigration detainee
- ☒ Convicted and sentenced state prisoner
- ☐ Convicted and sentenced federal prisoner

**IV. DEFENDANT(S)' INFORMATION**

List the following information for each defendant. If the correct information is not provided, it could result in the delay or prevention of service. Make sure that the defendant(s) listed below are identical to those contained on the first page. Attach additional sheets of paper as necessary. Do not write on the backs of any additional sheets. See Local Civil Rule 5.2(a).

Defendant 1: SUZANNE JORDAN (ET. AL.)  
*Full Name*  
CHOCTAW COUNTY JAIL ADMINISTRATOR  
*Current Job Title*  
305, E. JEFFERSON ST.  
*Current Work Address*  
HUGO OKLAHOMA 74743  
*City State Zip Code*

Defendant 2: TERRY PARKS ~~XXXXXXXXXX~~  
*Full Name*  
CHOCTAW COUNTY SHERIFF  
*Current Job Title*  
305, E. JEFFERSON ST  
*Current Work Address*  
HUGO OKLAHOMA 74743  
*City State Zip Code*

Defendant 3: Choctaw County Board of Commissioners  
*Full Name*  
To oversee operation of Choctaw County  
*Current Job Title*  
300 E. Duke Street Ste. 13  
*Current Work Address*  
Hugo Oklahoma 74743  
*City State Zip Code*

Defendant 4: BRANDY Wallace  
*Full Name* CHOCTAW COUNTY  
Assistance Jail Administrator  
*Current Job Title*  
305 E. Jefferson ST  
*Current Work Address*  
Hugo Oklahoma 74743  
*City State Zip Code*

Defendant 5: \_\_\_\_\_  
*Full Name*  
\_\_\_\_\_  
*Current Job Title*  
\_\_\_\_\_  
*Current Work Address*  
\_\_\_\_\_  
*City State Zip Code*

## V. STATEMENT OF CLAIMS

## A. Claim 1

Date(s) of occurrence: November, December 2023 thru March 2024Place(s) of occurrence: Choctaw County Jail in Hugo, Oklahoma

State which of your federal constitutional or federal statutory rights have been violated:

8<sup>th</sup>, 14<sup>th</sup> Amendment Violation Constitutional Rights claim

Briefly state the FACTS that support your case. Provide a short and plain statement of how each named defendant was personally involved in the violation of your constitutional rights and why you are entitled to relief from each named defendant. See Fed. R. Civ. P. 8(a). Do not cite case law.

FACTS: Failing to provide treatment for diagnosed condition: Denying treatment; ignoring obvious conditions,

medical Negligence, Cruel (and) Unusual punishment. Denial of use of my (CPAP) device - have obstructed sleep Apnea. Was denied for five months, while it was kept in the County Jail property room. Supposedly where I was housed at - the federal holding facility (Tribal side of Choctaw County Jail didn't have plugins to hook up my (CPAP) which there was plugins. (Deliberate Indifference) - medical Negligence)

## B. Claim 2

Date(s) of occurrence: 2024 April 28<sup>th</sup>, 29<sup>th</sup>, 30<sup>th</sup> / May 1<sup>st</sup>, 2024Place(s) of occurrence: Choctaw County Jail in Hugo, Oklahoma

State which of your federal constitutional or federal statutory rights have been violated:

8<sup>th</sup>, 14<sup>th</sup> Eighth, Fourteen Amendment Violation Constitutional Rights claim

FACTS: Medical Negligence, Failure to provide Adequate Medical Care, Jail Personnel have acted with "Deliberate Indifference" to my type 2 Diabetes by denying me my medication (Met Formin) and by not

monitoring my blood sugar - daily. NOR blood pressure check, do to being hypertension and having pre-existing medical conditions. Was given a medication by Jail personnel "clonidine" - without checking my blood pressure. First - which the medication dropped my blood pressure to 30/40 and was transported to Hugo, Oklahoma (hospital) by ambulance from Choctaw County Jail. which cause me to be put in ICU till my blood pressure was able to get up to normal range. The clonidine medication was only suppose to be given to me after checking my blood pressure if it was high then the clonidine was to be given to lower the blood pressure, but Jail personnel didn't check my blood pressure that morning when medication was passed out. The also would make my family pay for medication OR I couldn't get any of my medications. (Deliberate Indifference) AN Ignoring obvious conditions. as well.



## C. Claim 3

Date(s) of occurrence: May through June (2024)Place(s) of occurrence: Choctaw County Jail - in Hugo Oklahoma  
AND Hugo clinic office / with CARDIOLOGIST specialist

State which of your federal constitutional or federal statutory rights have been violated:

<sup>1st</sup> <sup>8th</sup> <sup>14th</sup>  
First, Eighth, Fourteenth Amendment violations Right claim

JAIL ADMINISTRATOR - JORDAN) FAIL TO PROVIDE Adequate medical  
FACTS: CARE / CRUEL & UNUSUAL punishment, and medical Negligence)  
WAS took place due to MS. JORDAN Denying for the CARDIOLOGIST I WAS seeing  
monthly in Hugo clinic, for pre-existing medical conditions, Diabetes, hypertension  
heart problems, the specialist wanted to do testing of my heart that require  
being sent to Oklahoma city hospital to be tested there, MS. JORDAN told DR.  
MADON the CARDIOLOGIST, she wouldn't allow me to get sent there, for  
testing, was refused to have the CARDIOLOGIST to see me any more / WAS  
denied medication given by the specialist, cause I didn't have ~~INSURANCE~~ <sup>INSURANCE</sup>  
D. Claim 4 She WAS being deliberate Indifference"

Date(s) of occurrence: JUNE 18, 2024 thru July, August 2024Place(s) of occurrence: Choctaw County Jail - in Hugo Oklahoma

State which of your federal constitutional or federal statutory rights have been violated:

<sup>8th</sup> <sup>14th</sup> <sup>1st</sup>  
Eighth, Fourteenth, First Amendment violations Constitutional Right  
CLAIM.

FACTS: INFliction of Emotional Distress (and) PAIN & suffering, CRUEL  
and UNUSUAL punishment. Denying pain medications and prescribed  
medication CAUSING PAIN and TRAUMA, Being put in solitary confinement for over  
two months and completely cut off communication with the outside world. Complete  
Isolation no phone, not even television in the Detoxication - Suicide cell I was housed in.  
(UNLAWFUL and DAMAGING) while in Jail, Jail personnel would throw away my out  
going mail, and incoming mail at times where NEVER given to me, my legal mail  
when I was given would be open with-out being present. I WAS kept FROM  
communicating out or using the phone to contact my family. Also IN Adequate  
Ventilation, and deprivation took place of outdoor exercise. Jail personnel  
allow other inmates to throw URINE, body fluids on me while  
I WAS in the cell, when I went to shower, the JAIL personnel new about  
it as allow inmates at Choctaw County Jail take place in throwing  
there URINATION on me, and Refuse to give me clean clothes, or  
shower. The county Sheriff also allow this all to happen to me. that  
cause me INFliction of emotional Distress and pain, suffering, trauma  
and mental Anguish. & failure to Administer mandatory sight checks  
(Legitimate Penological Interest) Neglected

**VI. RELIEF REQUESTED**

Briefly state what you want the Court to do for you. Do not make legal arguments or cite cases or statutes.

I PRAY For the Court to see the problems in Choctaw County Jail, not just for me but for future inmates being held there. I PRAY for monetary Relief in the amount of (\$10,000,000) million DOLLAR'S paid out to me. For Infliction of Emotional Distress, and for pre-existing medical conditions, suffered physical pain, and mental Anguish. Also Requesting all payments of future medical bills, plus Any and all court fees, attorney's bills be paid that Accrued. Failure to give medical care that reasonable persons would've given. Requeusting all above.

**VII. PRISONER'S LITIGATION HISTORY**

The "Three Strikes Rule" bars a prisoner from bringing a civil action or an appeal in forma pauperis in federal court if the prisoner has "on three or more occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury." 28 U.S.C. § 1915(g).

Have you brought any other lawsuits in federal court while a prisoner?

☐ Yes ☒ No

If yes, how many? NA

Number each different lawsuit below and include the following:

- Name of case (including defendants' names), court, and docket number
- Nature of claim made
- How did it end? (For example, if it was dismissed, appealed, or is still pending, explain below.)
- Did the court assess a "Strike" or find the dismissal a "Prior Occasion" pursuant to 28 U.S.C. 1915 (g).

NA

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**VIII. PLAINTIFF'S DECLARATIONS:**

I declare under penalty of perjury that the foregoing is true and correct. To the best of my knowledge, information, and belief, this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending or modifying existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11 of the Federal Rules of Civil Procedure.

I agree to provide the Court Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Court Clerk's Office may result in the dismissal of my case.

Joe Luis Villasana  
Plaintiff's Signature

10/08/24  
Date

I further declare under penalty of perjury that I placed this complaint in the prison's legal mail system, with the correct postage attached, on the 08 day of October, 2024.

Joe Luis Villasana  
Plaintiff's Signature

10/08/24  
Date